



OKIN HOLLANDER

Okin Hollander LLC  
Glenpointe Centre West, 2<sup>nd</sup> Floor  
500 Frank W. Burr Boulevard, Suite 40  
Teaneck, NJ 07666  
T 201 947 7500  
F 201 947 2663

Paul S. Hollander, Esq.  
phollander@okinhollander.com

December 20, 2024

**VIA ECF AND EMAIL to [chambers\\_of\\_vfp@nj.uscourts.gov](mailto:chambers_of_vfp@nj.uscourts.gov)**

The Honorable Vincent F. Papalia  
United States Bankruptcy Judge  
District of New Jersey  
50 Walnut Street  
Newark, New Jersey 07102

**Re: Atlantic Neurosurgical Specialists, P.A., ANS Newco LLC and Hanover Hills Surgery Center LLC**

**Settlement Agreement Annexed to Motion of the ANS Debtors for an Order Approving the Settlement by and Between the Settling Parties dated December 16, 2024 and the Amended Combined Disclosure Statement and Chapter 11 Plan of Liquidation Attached as Exhibit “A” Thereto (the “Settlement Agreement” and the “Plan,” respectively)**

**Hearing Date: December 23, 2024 at 10:00 a.m.**

Dear Judge Papalia:

As this Court is aware, we represent Paul S. Saphier, M.D. (“Dr. Saphier”), who is one of the shareholders in ANS Founders, PC.

In connection with Monday’s hearing to consider the Settlement Motion and related Settlement Agreement and Plan, we are writing to advise that the Settlement Agreement and the Plan to be attached thereto continue to be moving targets. Each of the documents has undergone substantial revisions since the Settlement Motion was filed. As of now, there continue to be a number of issues as to which final language has still not been agreed upon.

We are presently guardedly optimistic that the open issues will be resolved and that mutually acceptable versions of the Settlement Agreement and Plan that will be presented to the Court on Monday.

In the interest of moving this process along, we are not filing objections to the Settlement Motion at this time. Rather consistent with the Scheduling Order entered in this matter, we are reserving all of our client’s rights to present his objections, and positions at the Hearing.



**OKIN HOLLANDER**

The Honorable Vincent F. Papalia  
December 20, 2024  
Page 2

We look forward to constructively participating in the Hearing on Monday.

Respectfully submitted,

**OKIN HOLLANDER LLC**

By: /s/ Paul S. Hollander  
Paul S. Hollander

*Counsel for Paul S. Saphier, M.D.*

cc: Francine Steele, Esq.  
Peter D'Auria, Esq.  
David L. Bruck, Esq.  
Joseph J. DiPasquale, Esq.  
Patricia A. Staiano, Esq.  
Ryan Jareck, Esq.  
Christopher, Massaro, Esq.  
Sam Della Fera, Esq.  
Richard J. Bernard, Esq.  
Morris S. Bauer, Esq.  
All Parties included on ECF Service List